

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re

FTX TRADING LTD., *et al.*¹

Debtor.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

Obj. Deadline: Oct. 12, 2023 at 4:00 p.m. (ET)

Hearing Date: Oct. 19, 2023 at 10:00 a.m. (ET)

**NOTICE OF MOTION OF THE JOINT LIQUIDATORS FOR RELIEF FROM STAY
UNDER SECTION 362 OF THE BANKRUPTCY CODE**

PLEASE TAKE NOTICE that Russell Crumpler and Christopher Farmer, in their capacities as the joint liquidators (collectively, the “**Joint Liquidators**”) appointed in the British Virgin Islands (“**BVI**”) liquidation of Three Arrows Capital, Ltd. (in liquidation) (the “**3AC Debtor**”) and foreign representatives of the 3AC Debtor, as recognized pursuant to chapter 15 of the Bankruptcy Code, by and through the undersigned counsel filed the attached *Motion of the Joint Liquidators of Three Arrows Capital, Ltd. for Entry of an Order (I) Modifying The Automatic Stay Pursuant to 11 U.S.C. § 362(D)(1) and Bankruptcy Rule 4001 and (II) Granting Related Relief* (the “**Motion**”).

PLEASE TAKE FURTHER NOTICE that objections or responses, if any, to the Motion must (a) be in writing (including supporting documentation required by Local Rule 4001-1(c)), (b) be filed with the Clerk of the Bankruptcy Court, 824 Market Street, 3rd Floor, Wilmington, Delaware 19801, on or before **October 12, 2023 at 4:00 p.m. (ET)** (the “**Objection Deadline**”), and served upon the undersigned counsel and the Office of the United States Trustee for the District of Delaware, J. Caleb Boggs Building, 844 King Street, Suite 2207, Lockbox 35, Wilmington, Delaware, 19801, Attn: Juliet M. Sarkessian (juliet.m.sarkessian@usdoj.gov).

PLEASE TAKE FURTHER NOTICE that the attorneys for the parties shall confer with respect to the issues raised by the Motion in advance of the related hearing for the purpose of determining whether a consensual order may be entered and/or for the purpose of stipulating to any relevant facts.

**PLEASE TAKE FURTHER NOTICE THAT A HEARING ON THE
MOTION WILL BE HELD ON OCTOBER 19, 2023 AT 10:00 A.M. (ET) BEFORE THE**

¹ The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the FTX Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the FTX Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

HONORABLE JOHN T. DORSEY, AT THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE, 824 MARKET STREET, 5TH FLOOR, COURTROOM #5, WILMINGTON, DELAWARE 19801.

IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED IN THE MOTION WITHOUT FURTHER NOTICE OR HEARING.

Dated: September 29, 2023
Wilmington, Delaware

Respectfully submitted,

/s/ John W. Weiss

John W. Weiss (No. 4160)
Joseph C. Barsalona II (No. 6102)
PASHMAN STEIN WALDER HAYDEN, P.C.
1007 North Orange Street, 4th Floor #183
Wilmington, DE 19801
Telephone: (732) 852-2481
Facsimile: (732) 852-2482
Email: jweiss@pashmanstein.com
jbarsalona@pashmanstein.com
– and –

Christopher Harris
Adam J. Goldberg
Brett M. Neve
Nacif Taousse
LATHAM & WATKINS LLP
1271 Avenue of the Americas
New York, NY 10020
Telephone: (212) 906-1200
Facsimile: (212) 751-4864
Email: adam.ravin@lw.com
chris.harris@lw.com
adam.goldberg@lw.com
brett.neve@lw.com
nacif.taousse@lw.com
– and –

Nima H. Mohebbi
Tiffany M. Ikeda
LATHAM & WATKINS LLP
355 South Grand Avenue, Suite 100
Los Angeles, CA 90071
Telephone: (213) 485-1234
Facsimile: (213) 891-8763
Email: nima.mohebbi@lw.com
tiffany.ikeda@lw.com
*Counsel to the Joint Liquidators
of Three Arrows Capital, Ltd. (in liquidation)*